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September 12, 2017

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joaquin Archivaldo Guzman Loera, 09 CR 466 (BMC)

Your Honor:

Pursuant the Court's Order of September 12, 2017, we write, in an abundance of caution, to request the Court's permission to provide Mr. Guzman's noticed private counsel, A. Eduardo Balarezo, with copies of the extradition petitions from the Western District of Texas and the Southern District of California, as well as all other publicly available or independently obtained documents defense counsel has received during the course of its representation of Mr. Guzman. We also seek permission to provide Mr. Balarezo with unredacted copies of all docketed filings, including those currently under seal.

Given the proximity of the trial date, we believe it is in the best interest of Mr. Guzman, the Court and the government to share the fruit of our investigation with private counsel. I thank the Court in advance for its consideration in this matter.

Respectfully submitted,

/s/

Michelle Gelernt, Esq.
Michael K. Schneider, Esq.
Edward S. Zas, Esq.

cc: Clerk of the Court [by ECF]
Mr. A. Eduardo Balarezo
AUSA Patricia Notopoulos, Esq.
AUSA Andrea Goldbarg, Esq.
AUSA Michael Robotti, Esq.
AUSA Hiral Mehta, Esq.
AUSA Adam Fels, Esq.
AUSA Amanda Liskamm, Esq.